

Colorado Department of Public Health and Environment
Hazardous Materials and Waste Management Division

Comments on

**Draft Permit Modification of State RCRA Permit for RFETS
for Storage and Treatment of Contaminated Soils from IHSS 109**

1. Section 1 states that the container storage areas and the thermal desorption (TD) unit are considered temporary units under 264.553. A justification for designation as a temporary unit needs to also be stated. Section 264.553(i) says, "the Department shall document the rationale for designating a temporary unit...and shall make such documentation available to the public."
- ✓ 2. The paragraph in Section 2.1 describing inspections of soil containers says that inspections will be conducted weekly "to the extent practicable." What conditions would prevent these inspections from happening as a weekly routine? An attached inspection logsheet example could be modified to record these inspections.
- ✓ 3. The paragraph near the end of Section 2.1 should reference the Permit's Contingency Plan (Part IV) in regard to the removal of spilled or accumulated liquids. Removal within 48 hours is inadequate and inconsistent.
4. This document references the thermal treatment standards in Subpart P of Section 265 in the last paragraph of Section 2.2.1. What are the "appropriate" standards in this subpart and how will those requirements be complied with?
5. What specific "industrial hygiene monitoring requirements" are referred to in the last paragraph in Section 2.2.1, which are proposed instead of Section 265.377 requirements?
6. At the end of Section 2.2.1, this document says that the vendor of the TD unit might demonstrate that "alternative temporary unit standards are appropriate." Any proposed modifications to unit standards or parameters need to be submitted to CDPHE at least 5 business days prior to startup of this TD unit. A "Treatment Unit Information Sheet" could be used to list these standards and parameters; an example is attached.
7. Section 2.2.4 refers to the CERCLA delisting process. To "delist" a waste under RCRA, Section 260.22 of the CHWR must also be considered.
8. Sections 2.2.4 and 2.2.5 do not address potential radiological contamination of the processed soil or secondary waste streams.
9. Rather than merely referencing the decontamination procedures for the roll-off containers and TD unit in Section 3.0, a unit-specific closure plan should be included as part of this

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permit modification. This plan should identify among other things: closure performance standards, likely decontamination solutions and methods, amount of waste to be generated by the decontamination methods, and timeframes for closure.

- ✓ 10. Because the Sampling and Analysis Plan referred to in Section 4.0 has been reviewed and approved by CDPHE and EPA, all the verbs can be changed to the past tense.
- 11. Where is the information about limiting hazards and safety issues that Section 9.0 implies this document contains?

7.9,

TREATMENT UNIT INFORMATION SHEET

Unit Number: 93.153
Building: 771
Room: 180D
Glovebox: D-2

Treatment Unit Description: Precipitation

Function: Miscellaneous Treatment

Design Capacity: 36 liters per day
Maximum Process Capacity: 51 liters

Dimensions: 12' Long x 2'6" Deep x 6'3" High

Waste Codes: D002, D004, D006, D008, D011
Waste Description: Mixed Residue or Transuranic Mixed Waste

Secondary Containment:
Type: Glovebox
Minimum Berm Height: NA
Drawing Number: D26025-1 Rev. C

Inspection: Visual
Process Control Variables: pH, Temperature
Maximum: Maximum temperature of 80°C.
Minimum: Temperature - none, pH - final minimum of 6

[Monitoring:
Instrument Readout/Visual: pH, Temperature
Continuous w/ Alarm: Select Alpha Air Monitor] Coverage

Overfill Prevention: None
Drawing Number: 39650-302A

Unit Specific Conditions:

1. Dimensions identified are the overall dimensions of the glovebox in which the treatment unit is located in. Additional process control variables, if developed as part of system testing, will be documented in the operating record for the facility.
2. Waste Analysis - See Table 5
3. Prior to initiating the operation of this unit, the building Health and Safety Plan and the approved procedure for the operation of the Hydroxide Precipitation process will be submitted to the Colorado Department of Public Health and Environment for review. Following a 7 day review period, operation of the unit may commence.
4. Container Labeling: If conditions within the glovebox do not allow the application of a label to a bottle (i.e., the label will not stick to the bottle), the bottle will be numbered, and a label completed with the bottle number and the required information being placed on the outside of the glovebox.

July 19, 1995

XVI-9

**RCRA TREATMENT UNIT 93.153 - BUILDING 771
HYDROXIDE PRECIPITATION DAILY INSPECTION LOGSHEET**

ROOM					
UNIT ID NO.					
DATE					
TIME					
SIGNATURE OF INSPECTOR					
SIGNATURE OF SUPERVISOR (WEEKLY)					

The following logsheet must be filled out completely and accurately. The only acceptable responses are "Yes", "No", or "NA". Inspections must be performed so that no more than 24 hours elapse between inspections.

1. Are unit signs present, correct, and visible at each entrance to Room 180D?
- *2. Is process solution or filtrate solution present within the treatment unit?
3. Is adequate aisle space present around treatment unit and clear of obstruction?
4. Is the secondary containment free of cracks, gaps, erosion, or corrosion?
5. Is the secondary containment free of liquids?
6. Is the secondary containment free of unnecessary debris and trash?
7. Are any wastes present in the unit which it is not approved for?
8. Is process equipment (i.e., precipitation vessels) in good condition?
9. Lack of evidence of leakage from process containers?
10. Is each bottle present in the treatment unit in good condition and clear of obstruction?
11. Criticality drain in good condition and is the opening clear of obstruction?
12. Is process monitoring equipment present and operable?
13. Is spill response equipment adequate, accessible, and in good working condition?

* If the response to this question is "No", the inspector must note in the comment section that inspections are not required if process or filtrate solutions are not present in the treatment unit.

REMEDIAL ACTIONS

- Always notify Supervisor of any problems
- "NO" answers require explanation and/or corrective action in the comments section.
- All RCRA findings that cannot be corrected within 24 hours must be reported to DOE per 1-15200-ADM-16.02.

COMMENTS and CORRECTIVE ACTIONS (If additional space is required the reverse side of this logsheet may be used for comments)

DATE

DATE

July 19, 1995

XVI-10